

**To:** Sheryl Reba[sreba@greenbergdauber.com]  
**From:** Fajardo, Juan  
**Sent:** Mon 5/15/2017 4:06:23 PM  
**Subject:** RE: Diamond Alkali

Sheryl,

We have reviewed our files and it appears that Wiggins has a limited ability to pay. It's been a while since the last time we considered Wiggins' ability to pay so we need to update our information on the Company. Please provide tax returns for the last 3 years. Also, please confirm that there is no insurance coverage related to this matter and that the Company is not indemnified for costs related to this matter.

Thanks,

Juan M. Fajardo

Assistant Regional Counsel

**From:** Sheryl Reba [mailto:sreba@greenbergdauber.com]  
**Sent:** Wednesday, April 26, 2017 5:46 PM  
**To:** Fajardo, Juan <Fajardo.Juan@epa.gov>  
**Subject:** Diamond Alkali

Please see attached.

Sheryl Reba, Esq.



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